

<b>IN RE:</b>	:
<b>DANIEL N. DICKENSHEETS,</b>	: <b>CASE NO.1-19-00983-HWV</b>
<b>aka DAN N. DICKENSHEETS</b>	:
<b>SHELLY MAE DICKENSHEETS,</b>	: <b>CHAPTER 13</b>
<b>fka SHELLY M. GROFT, fka SHELLY</b>	:
<b>KEENEY, aka SHELLY M. DICKENSHEETS,</b>	:
<b>fka SHELLY MAE GROFT</b>	:
<b>Debtors</b>	:
	:
<b>WELLS FARGO BANK, N.A.</b>	:
<b>d/b/a WELLS FARGO AUTO</b>	:
<b>Movant</b>	:
	:
<b>v.</b>	:
	:
<b>DANIEL N. DICKENSHEETS,</b>	:
<b>aka DAN N. DICKENSHEETS</b>	:
<b>SHELLY MAE DICKENSHEETS,</b>	:
<b>fka SHELLY M. GROFT, fka SHELLY</b>	:
<b>KEENEY, aka SHELLY M. DICKENSHEETS,</b>	:
<b>fka SHELLY MAE GROFT</b>	:
<b>Respondents</b>	:

**AND NOW**, come Debtors, Daniel N. Dickensheets and Shelly Mae Dickensheets, by and through their attorney, Gary J. Imblum, and respectfully respond as follows:

1. Debtor filed a Chapter 13 Bankruptcy to the above term and number on or about March 12, 2019.
2. A Motion for Relief from the Automatic Stay by Wells Fargo Bank on or about March 23, 2020.
3. On June 8, 2020, a Stipulation resolving the Motion was filed with the Court and a Court Order approving same was entered.

4. On June 8, 2021, Wells Fargo sent the Debtors' counsel a Notice of Default indicating total arrears of \$4,579.29 and that the Default needed to be cured by June 18, 2021.

5. On June 21, 2021, Debtors made a payment to Wells Fargo of \$4,500.00 as evidenced by the attached screen shot of Debtors' bank statement.

6. Despite the payment as stated in the aforementioned paragraph, Wells Fargo filed a Certificate of Default on June 29, 2021.

7. Debtors have the ability to pay the remaining \$79.29 to bring the post-petition arrearage current on July 2, 2021.


8. Debtors' counsel sent an Email to counsel for Wells Fargo with proof of the \$4,500.00 payment at the end of the business day on June 29, 2021.

9. Counsel for Wells Fargo immediately responded that they would check with their client to see if the default had been cured and inquiring as to when the \$79.29 would be paid.

10. On June 30, 2021, Debtors' counsel responded stating that the \$79.29 would be paid on July 2, 2021.

**WHEREFORE**, Debtor respectfully requests that this Honorable Court refrain from entering an Order granting Wells Fargo Bank Relief from the Automatic Stay in the above matter.

Respectfully submitted,

  
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Gary J. Imblum  
Attorney I.D. No. 42606  
4615 Derry Street  
Harrisburg, PA 17111  
(717) 238-5250  
Fax No. (717) 558-8990  
[gary.imblum@imblumlaw.com](mailto:gary.imblum@imblumlaw.com)  
Attorney for Debtor

DATED: 06 / 30 / 2021

**CERTIFICATION OF SERVICE**

I, Carol V. Shay, Paralegal, do hereby certify that I have served a copy of the foregoing DEBTORS' OBJECTION TO CERTIFICATE OF DEFAULT FILED BY WELLS FARGO BANK, N.A. d/b/a WELLS FARGO AUTO upon the following persons by E-Service or by United States Mail, first class, postage prepaid, at Harrisburg, Dauphin County, Pennsylvania, addressed to:

JACK N. ZAHAROPOULOS, ESQUIRE  
CHAPTER 13 TRUSTEE  
VIA E-SERVICE

ADAM B. HALL, ESQUIRE  
MANLEY DEAS KOCHALSKI LLC  
FOR MOVANT  
VIA E-SERVICE

IMBLUM LAW OFFICES, P.C.



Bernadette A. Davis, Paralegal

4615 Derry Street

Harrisburg, PA 17111

(717) 238-5250

Fax No. (717) 558-8990

[gary.imblum@imblumlaw.com](mailto:gary.imblum@imblumlaw.com)

For Debtors

DATED: 06 / 30 / 2021